

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

NICHOLAS H. HAGLOF,

Defendant.

)  
)  
)  
)  
)  
)  
)  
)  
)  
)

Cause No. 4:20-CR-00384 HEA/SPM

**DEFENDANT'S SEVENTH MOTION FOR EXTENSION OF TIME**  
**TO FILE PRE-TRIAL MOTIONS**

Comes now Defendant, Nicholas H. Haglof, by and through counsel, and respectfully requests a forty-five-day extension of the filing deadline for pre-trial motions. In support of this motion, Counsel states as follows:

1. Defendant has been charged with one count of Receipt of Child Pornography and one count of Accessing with Intent to View Child Pornography.

2. Defense Counsel has filed a Motion for a Subpoena Pursuant to Rule 17(c) and oral arguments on the matter are set for October 26th. (Doc. 38). The Motion for Subpoena seeks witnesses and evidence to support a Motion to Suppress Evidence; however, it would not be proper to file the Motion to Suppress Evidence without having the necessary documents and witnesses to support it. After the Motion for a Subpoena is resolved, Defense Counsel will be able to file a Motion to Suppress Evidence.

3. The Court has been made aware of the sequencing of these motions and has previously indicated that Defense Counsel should file this request to ensure that today's motion deadline is extended past the currently docketed Evidentiary Hearing on October 26th as the

determination of that matter needs to be made prior to the final filing of a suppression of evidence motion.

4. Further, on October 5, 2021, a search warrant was authorized for the Defendant's phone. It is Defense Counsel's understanding that the search of the phone will be completed in the upcoming weeks. Depending on the results of this search the Defendant may need to file additional motions.

5. A joint motion to continue the Evidentiary Hearing has also been filed today. The parties anticipate settlement discussions once results of the search have been received.

6. Based on the foregoing, more time is needed before final pretrial motions can be filed.

7. A trial date has not been set for the cause.

8. The Government has no objection to this request for extension per counsel's discussion with AUSA Anderson.

9. This request for an extension of time is made in good faith for all the reasons listed herein and not to vex or harass the Court or the Government, but to ensure Defendant's Sixth Amendment right to effective assistance of counsel. The ends of justice will be best served by excluding these periods of delay from calculating deadlines that would otherwise apply. 18 U.S.C. §3161(h)(7)(A) and (B)(iv).

WHEREFORE, for the foregoing reasons Counsel for Defendant requests a forty-five-day extension of the deadline to file pre-trial motions.

Respectfully submitted,

FRANK, JUENGEL & RADEFELD,  
ATTORNEYS AT LAW, P.C.

By /s/ Daniel A. Juengel  
DANIEL A. JUENGEL (#42784MO)  
Attorneys for Defendant  
7710 Carondelet Avenue, Suite 350  
Clayton, Missouri 63105  
(314) 725-7777

**CERTIFICATE OF SERVICE**

I hereby certify that on October 21, 2021, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following.

Jillian Anderson  
Asst. United States Attorney  
111 South Tenth Street, 20<sup>th</sup> Floor  
St. Louis, Missouri, 63102

/s/ Daniel A. Juengel  
DANIEL A. JUENGEL